

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE AUTOMOTIVE PARTS
ANTITRUST LITIGATION : Master File No. 2:12-md-02311
: Judge Marianne O. Battani
: Special Master Gene J. Esshaki

ALL PARTS : :

THIS DOCUMENT RELATES TO: :
ALL ACTIONS :

**END-PAYOR PLAINTIFFS' NOTICE OF FILING UNDER SEAL
THE PARTIES' RESPONSE TO OBJECTIONS TO THE SPECIAL MASTER'S ORDER
REGARDING THE PARTIES' MOTION TO COMPEL DISCOVERY FROM
NON-PARTY OEMS AND ORDERING NON-PARTY RULE 30(B)(6) DEPOSITIONS**

End-Payor Plaintiffs, pursuant to the Stipulation and Protective Order Governing the Production and Exchange of Confidential Information (“Protective Order”) (ECF No. 200), hereby provide notice of filing under seal the Parties’¹ Response to Objections to the Special Master’s Order Regarding the Parties’ Motion to Compel Discovery From Non-Party OEMs and Ordering Non-Party Rule 30(b)(6) Depositions (“Response”). Paragraph 7 of the Protective Order provides that “this Order shall serve as a stipulated order for purposes of Civil Local Rule 5.3(b)” and requires all materials containing “Confidential Information or Highly Confidential Information” (as defined in the Protective Order) to be filed under seal, in accordance with the procedures

¹ The Parties as referred to in this notice include End-Payor Plaintiffs (“EPPs”), Automobile Dealer Plaintiffs (“ADPs”), Truck and Equipment Dealer Plaintiffs (“TEDPs”), The State of Indiana, and the State of Florida (collectively “Plaintiffs”), and Defendants in all actions in this MDL. Not all Defendants join with respect to all OEMs.

contained in the Protective Order. No means other than sealing will preserve the confidentiality of the confidential information contained in the Response.

Date: May 16, 2016

Respectfully submitted,

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